

May 18, 2005

National Organic Standards Board (NOSB)
C/o Arthur Neil
Room 4008 South Building
1400 and Independence Avenue SW
Washington DC 20250-0001

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Dear NOSB Chairman Jim Riddle:

Thank you in advance for considering the views presented in my letter.

I am writing to express my full support for the recent Livestock Committee Pasture Requirement recommendations. Enforcement of true access to pastures is necessary so that all organic ruminants receive a significant portion of their total feed intake from pasture. Let ruminants other than pasture grazed be known as 'non-pastured organic'. Further, I support and offer these additional recommendations:

1. "Pasture" shall be defined as (a) land managed to maintain and/or improve the properties of soil, water, and vegetative resources and (b) to provide maximum feed value by growing native grasses and other forages from which ruminants are able to graze on living plants.
2. Organic dairy animals, from 12 months of age and older, must consume no less than 30% of their daily dry matter intake from pasture for a minimum of 120 calendar days per year, with a maximum stocking rate of three (3) lactating dairy cows per acre.
3. Farms not in compliance with the above shall be allowed one year to come into compliance by filing an updated and enforceable farm plan, that specifies pastures in accordance with applicable law.

I urge the NOSB to adopt the Livestock Committee Pasture Recommendation and add the above language thereby strengthening the higher standard of organic quality and making true access to pasture a reality for all organic dairy farms.

Thank you again. Sincerely Yours,



Susan E. Stewart
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